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8 November 1988

TACOMA LANDFILL - REVIEW OF 104(e) RESPONSE  
WRITTEN ANALYSIS OF JONES-GODELL CORPORATION

PRP CODE: 081

RECOMMENDED PRIORITY: LOW (PRELIMINARY)

Jones-Goodell Corporation has manufactured and repaired small fiberglass boats at 1690 Marine View Drive in Tacoma since 1976 (Goodell, D., 3 October 1988, personal communication). Jones-Goodell uses lacquer thinner, which is a mixture of toluene and acetone, in the fiberglass construction and painting processes. Toluene and acetone are classified as hazardous substances under Section 101(14) of CERCLA and are designated as hazardous wastes by RCRA regulations. According to Mr. Daniel L. Goodell (3 October 1988, personal communication), none of the waste lacquer thinner contaminated with paint has been disposed of at the Tacoma Landfill. Mr. D. Goodell (3 October 1988, personal communication) also stressed that no hazardous substances or hazardous wastes, including liquid paint (Goodell, D. 9 November 1988, personal communication), have been placed in dumpsters or any "landfill receptacle."

Mr. D. Goodell (3 October 1988, personal communication) stated that Jones-Goodell Corp. implemented a hazardous waste disposal program in 1976, when the company first began operating in Tacoma. Because Jones-Goodell only constructed wood products for the first few years of operation, the waste material was stored onsite before disposal until an adequate amount had accumulated. According to Mr. D. Goodell (3 October 1988, personal communication), all hazardous waste materials that have been disposed of by Jones-Goodell have been transported to a designated facility by licensed transporters. In addition, all contaminated waste oils have been collected by an oil reclamation service.

Uniform hazardous waste manifests provided by Jones-Goodell Corporation indicate that during August 1987, nineteen 55-gal drums of waste lacquer



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thinner, which was a mixture of toluene and acetone, contaminated with paint, were transported from the Jones-Goodell facility by Ecology Ltd. of Kent and Safeco Environmental to the Safeco Environmental/Chemical Reclamation Service (CRS) recycling and disposal facility in Avalon, TX. Additional hazardous waste manifests from May 1988 revealed that six 55-gal drums of the waste lacquer thinner contaminated with paint were also transported to Safeco Environmental/CRS for disposal.

Jones-Goodell does not carry any insurance policies that provide liability coverage for damages resulting from releases of hazardous substances and/or hazardous wastes (Goodell, D., 3 October 1988, personal communication). Copies of Jones-Goodell's insurance policies were not provided in the company's 104(e) response. However, Mr. D. Goodell (9 November 1988, personal communication) indicated that Jones-Goodell's policies would be made available to the U.S. EPA if they are determined to be essential.

Information concerning Jones-Goodell's operations was not provided in the report summarizing the results of the Tacoma Landfill PRP search. Jones-Goodell reported in the company's 104(e) response that no hazardous substances and/or hazardous wastes from their facility were disposed of at the Tacoma Landfill. Apparently, all hazardous materials generated by Jones-Goodell have been transported to designated facilities for recycling or incineration. Therefore, Tetra Tech recommends assigning a low priority to Jones-Goodell Corporation for the purpose of this preliminary assessment. A follow-up letter is not recommended at this time.

#### REFERENCES

Goodell, D. 3 October 1988. Personal Communication (letter to Ms. Deborah J. Yamamoto, U.S. Environmental Protection Agency Region X, Seattle, WA). Jones-Goodell Corporation, Tacoma, WA. 174-00-31-001-081.

Goodell, D. 9 November 1988. Personal Communication (phone by Ms. Lynne M. Kilpatrick-Howard, Tetra Tech, Inc., Bellevue, WA). Jones-Goodell Corporation, Tacoma, WA. 174-00-42-001-081.